

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Cert. Mail No. _____

No. 31785

NOTICE OF VIOLATION

Date of Violation: May 6, 1994 at 4:00 p.m.

Name <u>Ash Grove Cement Company</u>		Responsible Person, Title <u>Gerald Brown - Plant Safety Eng.</u>	
Location of Violation (Address) <u>3801 E Marginal Wy So</u>		City <u>Seattle</u>	Zip <u>98134</u>
Mailing Address <u>Same</u>		City, State	County <u>King</u>
		Zip	Phone

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

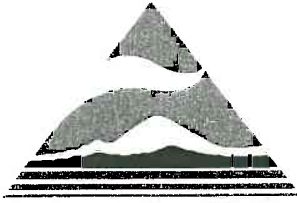
- ☐ Section 5.05(c) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☒ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Section _____
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION fugitive emissions from cement kiln front and rear seals

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice of the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By [Signature] Date/Time 5/6/94 Received By [Signature]
Form No. 70-119 (Revised 9/93) Signing this Notice is not an admission



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

June 30, 1994

Gerald J. Brown
Manager, Safety and Environment
Ash Grove Cement Company
3801 East Marginal Way South
Seattle, WA 98134

RECEIVED
JUL 1 1994
AGCW - SEATTLE

Dear Mr. Brown:

Ash Grove Cement Company
Request to Amend Notice of Approval No. 3382
and Notice of Violation No. 31785

On May 6, 1994, Notice of Violation No. 31785 was issued for fugitive emissions from the front and rear seals of the kiln.

At our June 28, 1994 meeting, we discussed issues relating to the Ash Grove request for modifying Order of Approval No. 3382 as outlined in the letters of May 9 and 18, and June 14, 1994. The two main concerns were the effectiveness of the kiln seals during startup periods and the possible relationship to the dust complaints from neighbors. The general process of operating the kiln and the schedule for startup were also reviewed. A copy of WAC 173-400-107 Excess Emissions and WAC 173-401-645 Emergency Provision was given to Ash Grove.

We then inspected the kiln that was operating normally and observed how the air flow was adequate to provide a negative pressure to control fugitive dust emissions around the kiln end seal.

We agreed that Ash Grove would notify the Agency during upset conditions to provide an opportunity for observing the operation of the kiln seal during a startup phase.

The usual processing time for a permit application is about 60 days; however, this engineering review will not be completed until after the specified conditions can be observed and evaluated. As we discussed at the meeting, some of the events relating to the kiln seal may have elements that are addressed either in WAC 173-400-107 or 173-401-645. The major concern is normal routine kiln startup periods and associated emissions. No Order of Approval shall be issued unless Best Available Control Technology (BACT) is employed to control emissions. Ash Grove must consider investigating alterations or construction of control devices or systems for the abatement of these emissions.

Please contact me at 689-4055 or FAX 343-7522 if you have any questions.

Very truly yours,

Fred L. Austin
Air Pollution Engineer

mj

cc D. S. Kircher
 J. M. Willenberg
 R. G. Busterna
 T. J. Hudson

Arthur Davidson, Acting Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
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AGCS2M000932

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

May 18, 1994

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98119-3958

Re: Notice of Violation #31785

Dear Mr. Austin,

The fugitive emission from the feed and discharge ends of the kiln which occurred on May 6, 1994 was due to process start up and could not be avoided. The start up was consistent with the approved O & M plan. The kiln shut down was a result of losing the main baghouse fan for high vibrations. The fan was quickly restarted without problem but a malfunction in the main burner igniter prevented an immediate kiln restart. While the igniter was being repaired, the kiln cooled sufficiently to require an approximate two hour preheat to replace the lost heat. The emission occurred during this preheat phase and as witnessed by Mr. Larry Vaughn of PSAPCA, completely disappeared when normal operations resumed.

Addressed in my May 9, 1994 letter to PSAPCA, fugitive visible emissions are present during the preheat phase of start up and are directly related to the limited ventilation in the kiln. As you are aware, preheat requires minimal induced draft due to the risk of overheating the empty vessels in the preheating tower. The reduced draft results in a leakage from the feed and discharge ends of the kiln since these locations cannot be completely sealed. This emission disappears once ventilation is introduced to maintain temperature within the preheater after the feed is started. Further, Ash Grove has requested that Order of Approval No. 3382 be amended to excuse from penalty these and similar excess emissions during start up, shutdown and maintenance procedures that cannot be prevented through a better O & M plan, etc. PSD order #90-03 provides for such exemption.

On June 1, 1992, NOV #28577 was issued for an identical event. This resulted in the attached letter proposing operational and equipment venting corrective action (29 June 1992 from Girish Sud, Senior Project Manager, Fuller Company). In addition to corrective actions which are currently utilized, the letter provides information on system design during normal and upset operating conditions.

We look forward to the opportunity to further discuss this condition at our June 9 meeting.

Sincerely,

Gerald J. Brown
Manager, Safety and Environment

Copy: KJR
ESP
HES
JTH